

1 THE HONORABLE BARBARA J. ROTHSTEIN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 HAROLD LANG,)
10 Plaintiff,) No. 2:21-cv-00795-BJR
11 v.)
12 STATE OF WASHINGTON, et al.,) STIPULATED MOTION AND ORDER
13 Defendants.) TO STRIKE PRETRIAL AND TRIAL
14) DATES
15)
16) Noting Date: March 30, 2022
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STIPULATION

The parties, by and through their attorneys of record, hereby stipulate and request that the Court strike all current pretrial and trial dates pending resolution of current health issues that are precluding Plaintiff's meaningful participation in the preparation of this case for trial.

The parties have been purposefully working to complete discovery in this case. Mr. Lang is experiencing unanticipated health issues that are precluding current work toward the current deadlines for expert witness disclosures and completion of discovery, including twice having been unable to attend scheduled Independent Medical Examinations without advanced notice. Mr. Lang is seeking assistance from appropriate professional outside the confines of this case.

STIPULATED MOTION AND ORDER
TO STRIKE PRETRIAL AND TRIAL DATES
No. 2:21-cv-00795-BJR

Civil Rights Justice Center PLLC
2150 N 107th Street, Suite 520
Seattle, Washington 98133
(206) 557-7719 / Fax: (206) 659-0183

1 In light of the current challenges Mr. Lang is navigating, the parties have stipulated and
2 request the Court strike the current case schedule in its entirety, including the current trial date.
3 The parties propose filing a new Joint Status Report by July 1, 2022, updating the Court on Mr.
4 Lang's status and proposing a new trial date with associated pretrial deadline. The parties submit
5 there is good cause for the relief requested.

6 In the alternative, the parties request a conference with the Court to discuss the case
7 status and a plan for moving the case forward to trial.

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10 DATED this 30th day of March, 2022.

11 ROBERT W. FERGUSON
12 Attorney General

13 /s/ Scott M. Barbara
14 **Scott M. Barbara**, WSBA #20885
15 Assistant Attorney General
16 Attorneys for State Defendants

17 WILLIAMS KASTNER

18 /s/ Heidi L. Mandt
19 **Heidi L. Mandt**, WSBA #26880
20 Attorney for Defendant Marquetta Washington

21 CIVIL RIGHTS JUSTICE CENTER, PLLC

22 /s/ Darryl Parker
23 **Darryl Parker**, WSBA #30770
24 Attorney for Plaintiff

ORDER

THIS MATTER having come before the Court on the foregoing Stipulation, and the Court having considered the Stipulation, and good cause appearing, now, therefore:

1. The Stipulated Motion to Strike Pretrial and Trial Dates is GRANTED.
2. The dates established by the Court's Order Setting Trial Dates and Related Dates, (Dkt. #21), and the subsequent Order amending same, (Dkt. #33), are hereby STRICKEN.
3. On or before July 1, 2022, the parties are directed to submit a Joint Status Report advising the Court on Plaintiff's then current condition and ability to assist in the preparation of this case for trial and proposing a new trial date and associated pretrial dates.

DATED this 6th day of April, 2022.

Barbara Rothstein

Barbara Jacobs Rothstein
U.S. District Court Judge